

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:  
LTL MANAGEMENT LLC,  
Debtor

Case No.: 21-30589 (MBK)  
Judge: Michael B. Kaplan  
Chapter 11

**APPLICATION FOR ORDER FOR ADMISSION  
PRO HAC VICE OF ROBERT J. KEACH, ESQ.**

**TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST**

**PLEASE TAKE NOTICE** that pursuant to Rule 101.1 of the Local Civil Rules for the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of the United States Bankruptcy Court, District of New Jersey, Traurig Law LLC, proposed local counsel to the Fee Examiner, hereby makes the application before the United States Bankruptcy

Court for the District of New Jersey, for entry of an order granting the admission pro hac vice of Robert J. Keach, Esq. of the law firm of Bernstein, Shur, Sawyer & Nelson, P.A., the Fee Examiner in the above-captioned chapter 11 case.

The undersigned relies upon the attached Certification of Robert J. Keach, Esq. in support of this application, and the undersigned certifies that he is admitted, practicing, and a member in good standing with the Bar of the State of New Jersey and admitted to practice before the United States District Court for the District of New Jersey.

The undersigned hereby requests that if no objection to the within application is filed within seven (7) days, the application be granted and the proposed form of Order be entered.

Dated: April 1, 2022

Respectfully submitted,

**TRAURIG LAW LLC**

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